



## **National Jewish Health Compliance Program**

The National Jewish Health Compliance Program is designed in accordance with the seven elements of an effective compliance program as set forth by the HHS Office of Inspector General (OIG) in its model hospital compliance program guidance of 2005. These elements are enforced by and addressed in the National Jewish Health Code of Conduct and Institutional policies.

- All National Jewish Health employees and contractors are trained within 30 days of hire and complete training annually regarding the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Health Information Technology for Economic and Clinical Health Act ("HITECH Act") and applicable Federal health care program requirements, including the requirements of the False Claims Act, Anti-Kickback Statute and the Stark Law.
- All National Jewish Health staff, vendors and contractors are screened against the HHS/OIG List of Excluded Individuals/Entities, GSA List prior to hire and again monthly thereafter.
- A Compliance Hotline is available 24 hours a day, seven days a week online and by phone for reporting of compliance concerns and questions. Anonymous reporting is available. NJH has a Non-Retaliation policy for compliance reports.

*In order to satisfy any Code of Conduct or training requirements, Clients may request a signed and dated copy of this form in place of an attestation by contacting the Chief Compliance Officer at [Compliance@NJHealth.org](mailto:Compliance@NJHealth.org). National Jewish Health will not review or distribute any Client's Compliance training materials.*